August 4, 2017

Honorable Ann M. Donnelly
United States District Judge
United States Courthouse for the Eastern District
225 Cadman Plaza
Brooklyn, NY 11201

Re: Sorenson v. Simpson
15 cv 4614 (AMD)

Dear Judge Donnelly,

This letter is in response to the letter of Sandra Simpson moving for permission to take an interlocutory appeal of your honor's decision on defendant's motion to dismiss. Ms. Simpson, who is appearing pro se, argues, in effect, that your honor was incorrect in not granting her motion to dismiss based on the statute of limitations because you did not know that the federal action brought on her behalf by Mr. Sorenson had been dismissed more than six years before this action was filed. Ms. Simpson's motion does not meet the standards for an interlocutory appeal as set forth in 28 U.S.C. 1292 (b).

Plaintiff Sorenson acknowledges the dismissal of the Federal case   but submits that his cause of action did not accrue, and therefore the statute did not begin to run until he received notice that Ms. Simpson had fired him from the case, which occurred approximately 2 years later. Between the dismissal of the Federal Court action, which was a prerequisite for seeking recompense from the administrative tribunal ("FCSC") created to compensate victims of Libyan hostility, and Ms. Simpson's discharging him, Mr. Sorenson worked tirelessly on Ms. Simpson's behalf, gathering evidence to submit to the tribunal and filing no less than 6 separate claims for compensation before the FCSC.

Ms. Simpson accepted all of this legal work and, in the end, never personally informed him that she had retained other counsel. (He learned of this when he called the FCSC to check on the status of a brief he had just filed on her behalf and they told him that she had retained Winston and Strawn to further pursue her claims.)

Should your honor wish further briefing on this issue, plaintiff will be glad to submit a more substantial memorandum.

Respectfully submitted

(s)

Lorna B. Goodman
Attorney for Plaintiff Sorenson

Cc: Sandra Simpson